

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2016 JUL 20 PM 2:19

DEPUTY CLERK

NT

UNITED STATES OF AMERICA

NO.

v.

**8-16CR0326-N**

JOHNNATTAN RAMIREZ (1)  
PEDRO LOUIS ALVAREZ (2)  
ROBERT RIVEROS (3)

To be Filed Under Seal

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Interfere with Commerce by Robbery  
(Violation of 18 U.S.C. § 1951(a))

On or about June 9, 2016, in the Dallas Division of the Northern District of Texas (NDTX), **Johnnattan Ramirez** (hereafter "**Ramirez**"), **Pedro Louis Alvarez** (hereafter "**Alvarez**"), and **Robert Riveros** (hereafter "**Riveros**"), the defendants, and other persons unknown to the Grand Jury, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, to commit a certain offense against the United States, to-wit: interference with commerce by robbery, in violation of 18 U.S.C. § 1951(a), a crime of violence.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to unlawfully take and obtain personal property, consisting of jewelry, from the person and in the presence of a jewelry salesman, in his capacity as a jewelry salesman, and against his will by means of actual and threatened force, violence, and fear of immediate injury to his person.

MANNER AND MEANS

It was part of the conspiracy that **Ramirez, Alvarez, Riveros**, and other persons unknown to the Grand Jury, planned with each other the robbery of a jewelry salesman who was conducting business at a jewelry store located at 300 South Central Expressway, Richardson, Texas, a location in the NDTX. At all times during the course and scope of the conspiracy, the jewelry salesman was conducting business in interstate and foreign commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect commerce, as contemplated in 18 U.S.C. § 1951.

It was further part of the conspiracy that **Ramirez, Alvarez, Riveros**, and other persons unknown to the Grand Jury formulated a plan and agreement which, among other things, included:

- a. the unlawful acquisition of jewelry; and
- b. the selection of a jewelry salesman to be robbed.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

To effect the object of the conspiracy, **Ramirez, Alvarez, Riveros**, and other persons unknown to the Grand Jury committed overt acts within the NDTX, including, but not limited to, the following:

1. On or about June 9, 2016, **Ramirez, Alvarez, Riveros**, and other persons unknown to the Grand Jury utilized rental vehicles to conduct surveillance outside a jewelry store located at 300 South Central Expressway, Richardson, Texas, where they believed a jewelry salesman was conducting business with a representative of the store.

2. On or about June 9, 2016, **Ramirez, Alvarez, Riveros**, and other persons unknown to the Grand Jury followed the jewelry salesman to a gas station located at 2344 Rental Car Drive, Euless, Texas, and took jewelry from the person and in the presence of the jewelry salesman, in his capacity as a jewelry salesman, and against his will by means of actual and threatened force, violence, and fear of immediate injury to his person.

In violation of 18 U.S.C. § 1951(a).

Count Two

Using and Carrying a Firearm During and in Relation to, and  
Possessing a Firearm in Furtherance of, a Crime of Violence  
(Violation of 18 U.S.C. § 924(c)(1)(A)(i))

On or about June 9, 2016, in the Dallas Division of the Northern District of Texas, **Johnnattan Ramirez, Pedro Louis Alvarez, and Robert Riveros**, the defendants, did knowingly use and carry a firearm, to-wit: a Taurus, Model PT738 TCP, .380 caliber pistol, bearing serial number 25247E, during and in relation to a crime of violence, namely, conspiracy to interfere with commerce by robbery, in violation of 18 U.S.C. § 1951(a), as alleged in Count One of this indictment, for which the defendants may be prosecuted in a court of the United States, and the defendants, did knowingly possess said firearm in furtherance of the commission of this offense.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

Forfeiture Notice

(18 U.S.C. §§ 924(d) and 981(a)(1)(C); 28 U.S.C. § 2461(c))

Upon conviction for the offense alleged in Count One of the indictment and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), **Johnnattan Ramirez, Pedro Louis Alvarez, and Robert Riveros**, the defendants, shall forfeit to the United States of America any property, real or personal, constituting or derived from proceeds traceable to the respective offense.

Further, upon conviction for any of the offenses alleged in Counts One and Two of the indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), **Johnnattan Ramirez, Pedro Louis Alvarez, and Robert Riveros**, the defendants, shall forfeit to the United States of America all firearms and ammunition involved or used in the commission of the offenses, including, but not limited to the following:

1. a Taurus, Model PT738 TCP, .380 caliber pistol, bearing serial number 25247E, and any ammunition seized with the firearm.

A TRUE BILL:

  
FOREPERSON

JOHN R. PARKER  
UNITED STATES ATTORNEY

  
KEITH ROBINSON  
Assistant United States Attorney  
Texas State Bar No. 00788298  
1100 Commerce, Third Floor  
Dallas, TX 75242  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

JOHNNATTAN RAMIREZ (1)  
PEDRO LOUIS ALVAREZ (2)  
ROBERT RIVEROS (3)

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INDICTMENT

18 U.S.C. § 1951(a)

Conspiracy to Interfere with Commerce by Robbery

18 U.S.C. § 924(c)(1)(A)(i)

Using and Carrying a Firearm During and in Relation to, and  
Possessing a Firearm in Furtherance of, a Crime of Violence

18 U.S.C. §§ 924(d) and 981 (a)(1)(C); 28 U.S.C. § 2461(c)

Forfeiture Notice

2 Counts

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A true bill rendered

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DALLAS

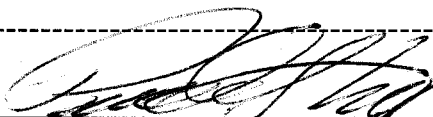
  
FOREPERSON

Filed in open court this 20th day of July, 2016.

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**Warrant to be Issued for all Defendants**

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UNITED STATES MAGISTRATE JUDGE  
Magistrate Court Number: 3:16-MJ-531-BN